



Jun 2, 2023

**FOIA REQUEST**  
**EPA Headquarters**

Dear FOIA Officer:

Pursuant to the federal Freedom of Information Act, 5 U.S.C. § 552, I am requesting a memo issued on November 9, 2020. The document is referred to in a December 30, 2020, unsigned memo with the subject line “OCSPP senior toxicologist review of the draft document titled “Human Health Toxicity Values for Perfluorobutane Sulfonic Acid (CASRN 375-73-5) and Related Compound Potassium Perfluorobutane Sulfonate (CASRN 29420-49-3).” Below is the link to the December memo:

[https://19january2021snapshot.epa.gov/sites/static/files/2021-01/documents/508\\_ocspp\\_sr\\_tox\\_review\\_of\\_ord\\_pfbs\\_document\\_12-30-2020\\_1.pdf](https://19january2021snapshot.epa.gov/sites/static/files/2021-01/documents/508_ocspp_sr_tox_review_of_ord_pfbs_document_12-30-2020_1.pdf).

The memo I am seeking is also referred to on p.33 of the EPA Inspector General’s March, 2023 report titled “The EPA’s January 2021 PFBS Toxicity Assessment Did Not Uphold the Agency’s Commitments to Scientific Integrity and Information Quality.” That report notes that, on November 9, 2020, “OPPT issued a memorandum expressing difference of scientific opinion with database uncertainty factors for PFBS TA.” It is this memorandum I am seeking. Please note that the EPA IG report and the 12/30 memo make it clear that the proposal in the 11/9 memo was adopted. It thus should not be considered “predecisional.”

I would like to receive the information in the following format: electronic.

I am available to discuss the scope of the request and any questions by phone (718-877-5236) or email ([sharon.lerner@propublica.org](mailto:sharon.lerner@propublica.org)).

As a representative of the news media I am only required to pay for the direct cost of duplication after the first 100 pages. This information is being sought on behalf of ProPublica, an independent, non-profit news organization, for dissemination to the general public.

Please waive any applicable fees. Release of the information is in the public interest because it will contribute significantly to public understanding of government operations and activities. As

a non-profit journalistic entity, ProPublica does not have the same commercial interests of other news organizations.

If my request is denied in whole or part, I ask that you justify all deletions by reference to specific exemptions of the Act. I will also expect you to release all segregable portions of otherwise exempt material. I, of course, reserve the right to appeal your decision to withhold any information or to deny a waiver of fees.

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I certify that my statements concerning the need for expedited processing are true and correct to the best of my knowledge and belief.

I look forward to your reply, as the statute requires.

Thank you for your assistance.

Sincerely,

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